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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBIN LEEANN MOORE-BROWN,
individually, and as Special Administrator of the
Estate of FRED NORRIS BROWN, III; B.B.B., a
minor child d/o/b, 03/12/2009; L.L.B., a minor
child, d/o/b, 12/02/2013; and L.K.B., a minor child,
d/o/b 12/29/2018,

Plaintiffs,

v.

CITY OF NORTH LAS VEGAS (CITY OF
NORTH LAS VEGAS POLICE DEPARTMENT);
ALEXANDER CUEVAS; and DOES 1-10,
inclusive,

Defendants.

CASE NO.: 2:20-cv-01649-GMN-DJA

**STIPULATION AND ORDER TO
EXTEND DISCOVERY
DEADLINES**

[SECOND REQUEST]

IT IS HEREBY STIPULATED AND AGREED between Plaintiffs, ROBIN LEEANN MOORE-BROWN, individually, and as Special Administrator of the Estate of FRED NORRIS BROWN, III, B.B.B, a minor child d/o/b, 03/12/2009, L.L.B, a minor child, d/o/b, 12/02/2013 and L.K.B, a minor child, d/o/b, 12/29/2018 (collectively hereinafter "Plaintiffs"), and Defendants CITY OF NORTH LAS VEGAS (CITY OF NORTH LAS VEGAS POLICE

DEPARTMENT) (“CNLV”) and ALEXANDER CUEVAS (“CUEVAS”) (collectively hereinafter the “PARTIES”), by and through their counsel of record, that the discovery cut-off date of August 26, 2021, be continued for a period of sixty (60) days up to and including October 25, 2021, for the purpose of allowing the parties to complete the depositions of experts and plaintiff.

I. DISCOVERY COMPLETED TO DATE

Defendants served their Initial Disclosure of Documents and Witnesses on December 23, 2020, First Supplemental on April 29, 2021.

Plaintiffs served their Initial Disclosure of Documents and Witnesses on January 15, 2021, First Supplement on March 25, 2021, Second Supplement on May 26, 2021, Third Supplement on June 10, 2021.

Plaintiffs have propounded one set of Interrogatories and Request for Production of Documents on Defendant City of North Las Vegas and one set of Interrogatories and Request for Production of Documents on Defendant Alexander Cuevas. Defendants served their responses on April 29, 2021.

Defendants have propounded one set of Interrogatories and Requests for Production of Documents on Plaintiffs. Plaintiffs served their responses on May 26, 2021.

Plaintiffs served their Designation of Expert Witnesses on June 28, 2021.

Defendants served their Designation of Expert Witness on June 28, 2021.

Deposition of Defendant Officer Alexander Cuevas was taken on July 8, 2021.

Deposition of Officer Chasity Smith was taken on July 8, 2021.

II. DISCOVERY YET TO BE COMPLETED

The parties anticipate the necessity of taking depositions of expert witnesses and plaintiff.

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III. REASONS WHY REMAINING DISCOVERY HAS NOT YET BEEN COMPLETED

The parties have been diligent in conducting discovery in this matter, and only have depositions left to be completed, two of which have been scheduled: the deposition of Expert Ken Katsaris is scheduled to take place on October 12, 2021 and the deposition of Expert Roger Clark is scheduled to take place August 25, 2021. The coordination of the experts' schedules has been difficult. As such, additional time is needed due to these issues.

IV. PROPOSED EXTENDED DEADLINES

The parties respectfully request this Court enter and order as follows:

A. Discovery Deadline.

The current discovery cutoff date of August 26, 2021 should be extended for a period of sixty (60) days, up to and including October 25, 2021.

B. Experts and Rebuttal Experts.

The parties have disclosed expert witnesses.

C. Dispositive Motions.

The parties shall file dispositive motions thirty (30) days after the close of discovery, on November 24, 2021.

D. Joint Pre-Trial Order.

The parties shall submit the Joint Pretrial Order, pursuant to LR 26(1)(e)(5) thirty (30) days after the date set for filing dispositive motions, on December 24, 2021, unless dispositive motions are filed, in which case the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the decision on the dispositive motions or further order of this Court.

This request for an extension is made in good faith and joined by all the parties in this case. The request is timely pursuant to LR 26-3; well in advance of any current deadline. Trial is not yet set in this matter and dispositive motions have not yet been filed. Accordingly, this extension will not delay this case. Moreover, since this request is a joint request, neither party

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1 will be prejudiced. The extension will allow the parties the necessary time to complete
2 discovery.

3 DATED: August 18, 2021

DATED: August 18, 2021

4 NORTH LAS VEGAS CITY ATTORNEY

PETER GOLDSTEIN LAW CORP


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13 **ORDER**

14 IT IS SO ORDERED.

15 DATED this 19th day of August 2021.

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18 Daniel J. Albregts
19 United States Magistrate Judge
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